1 THE HONORABLE RICARDO S. MARTINEZ 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 SAFECO INSURANCE COMPANY OF No.: 2:22-cy-00442-RSM AMERICA, 11 Plaintiff, STIPULATED MOTION TO EXTEND 12 DEADLINE FOR JOINT STATUS REPORT AND DISCOVERY PLAN v. 13 WILLIAM LENZ; NANCY LENZ; DAVID NOTED ON THE MOTION CALENDAR: P. MAROSI; CHERYL A. FORD-MAROSI; June 3, 2022 THE MAROSI LIVING TRUST, 15 Defendants. 16 17 Plaintiff Safeco Insurance Company of America ("Safeco") and Defendants William 18 and Nancy Lenz (the "Lenzes") (together, the "Parties") hereby stipulate and respectfully 19 request that the Court enter an order continuing the deadline to file the Joint Status Report and 20 Discovery Plan by one week, to June 10, 2022. Defendants David P. Marosi, Cheryl A. Ford-21 Marosi, and The Marosi Living Trust have not yet appeared in this action. Pursuant to this Court's April 22, 2022 Order Regarding Initial Disclosures, Joint Status Report, and Discovery 23 Plan (Dkt. 7), Safeco and the Lenzes held a Rule 26(f) conference on May 20, 2022 and exchanged initial disclosures on May 27, 2022. The Order also set a deadline of June 3, 2022

for the Parties to submit a Joint Status Report and Discovery Plan. Safeco and the Lenzes

continue to work through the details of thar Report and need additional time to reach agreement

regarding various items. The proposed extension will not affect any other deadlines in this 1 2 action. Accordingly, Safeco and the Lenzes submit that good cause exists to extend the 3 deadline by an additional week, to June 10, 2022. 4 IT IS SO ORDERED. DATED this 6<sup>th</sup> day of June, 2022. 5 6 7 8 RICARDO S. MARTINEZ 9 CHIEF UNITED STATES DISTRICT JUDGE 10 11 12 Presented by: 13 BULLIVANT HOUSER BAILEY PC 14 15 By /s/ Jared F. Kiess Michael A. Guadagno WSBA #34633 16 Email: michael.guadagno@bullivant.com Jared F. Kiess, WSBA #54532 17 Email: jared.kiess@bullivant.com 18 Attorneys for Plaintiff Safeco Insurance Company of America 19 20 FOREMAN STURM & THEDE LLP 21 22 By /s/ Linda L. Foreman Linda L Foreman WSBA #11817 23 Email: linda@foremansturm.com 24 Attorneys for Lenz 25 4870-1295-2611.1

1	CERTIFICATE OF SERVICE
2	I hereby certify that on June 6, 2022, I electronically filed the foregoing with the
3	Clerk of the Court using the CM/ECF e-filing system which will send notification of such
4	filing to the persons listed below:
5	Linda L. Foreman via hand delivery. FOREMAN STURM & THEDE LLP via first class mail.
<ul><li>6</li><li>7</li></ul>	5825 60th St SE Snohomish, WA 98290-5104 linda@foremansturm.com
8	Attorneys for Defendants William Lenz and Nancy Lenz
10	Dated: June 6, 2022.
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12	/s/ Kristin Anderson
13	Kristin Anderson, Legal Assistant
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